## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

ELIZABETH CARTER,

Plaintiff,

v.

Case No. 1:20-cv-00888 Hon. Hala Y. Jarbou Mag. Judge Sally J. Berens

STATE FARM FIRE AND CASUALTY COMPANY,

Defendant.

MELAMED, LEVITT, MILANOWSKI & EARLS, P.C. By: Richard A. Levitt (P28073) Attorney for Plaintiffs 26611 Woodward Avenue Huntington Woods, MI 48070 T: (248) 591-5000/F: (248) 541-9456

ricklevitt@mlmepc.com amberthomas@mlmepc.com RIZZODAY, P.C.
By: Devin R. Day (P60298)
Brian J. Gallagher (P72712)

Attorneys for Defendant
220 Lyon Street NW, Suite 200
Grand Rapids, MI 49503-2209
T: (616) 451-8111/F: (616) 451-8189
dday@rizzoday.com

bgallagher@rizzoday.com

## STIPULATION TO EXTEND MOTIONS IN LIMINE DEADLINE

The parties request the Court allow an extension of the deadline to file motions *in limine*. This request is made in light of Plaintiff's counsel being out of his office from January 21, 2022, through January 30, 2022, suffering from Covid-19. Following his negative Covid-19 test on January 31, 2022, he left the state on February 1, 2022, for a pre-paid trip to Florida through February 24, 2022. Due to technological problems, Plaintiff's counsel was unable to remotely access his office files and, candidly, was unaware of the February 2, 2022 filing deadline.

Subject to the approval of the Court, Plaintiff Elizabeth Carter and Defendant State Farm Fire and Casualty Company agree to extend the deadline entered in the Court's November 6, 2020

Corrected Case Management Order [PageID.55]. The parties have agreed to extend the date previously set by the Court (February 2, 2022) by seven (7) days (February 9, 2022). Accordingly, the parties stipulate to amend the Corrected Case Management Order as follows:

Previous Date New Date

Motions in Limine: February 2, 2022 February 9, 2022

Respectfully submitted,

MELAMED, LEVITT, RIZZODAY, P.C. MILANOWSKI & EARLS, P.C.

/s/Richard A. Levitt

By: Richard A. Levitt (P28073)

Attorney for Plaintiff
26611 Woodward Avenue

Huntington Woods, MI 48070

T: (248) 591-5000/F: (248) 541-9456

ricklevitt@mlmepc.com

Dated: February 3, 2022

/s/Devin R. Day (w/permission)

By: Devin R. Day (P60298)

Attorney for Defendant
220 Lyon Street NW, Suite 200
Grand Rapids, MI 49503-2209
T: (616) 451-8111/F: (616) 451-8189

1: (010) 431-8111/F: (010) 431-8

dday@rizzoday.com